

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

ALLSTATE INSURANCE COMPANY, ET AL.,  
Plaintiffs,

Case No.: 14-cv-6756

-against-

**ANSWER**

A & F MEDICAL P.C., ET AL.  
Defendant(s).

-----X

Defendants, BSZ CHIROPRACTIC, P.C., GOLDEN HANDS CHIROPRACTIC, P.C. and YAKOV ZILBERMAN, D.C. (heretoafter "Defendants") by and through their attorneys, the Law Firm of Natalia Skvortsova, PLLC as and for their answer to Plaintiffs' complaint state as follows:

**ANSWERING ALLEGATIONS RELATED TO PRELIMINARY STATEMENT**

1. Defendants deny allegations contained in Paragraphs One, Three through Seventeen, Nineteen, Twenty-One through Twenty-Five, Thirty through Thirty-Seven, Forty through Forty-Five of the Complaint.

2. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two, Eighteen, Twenty, Twenty-Six through Twenty-Nine of the Complaint.

3. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraph Thirty-Eight and Thirty-Nine of the Complaint and relies on the contents of documents, if any.

**ANSWERING ALLEGATIONS RELATED NATURE OF THE ACTION**

4. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Forty-Six through Fifty of the Complaint.

5. Defendants deny allegations contained in Paragraphs Fifty-One of the Complaint.

**ANSWERING ALLEGATIONS RELATING TO THE PARTIES**

**Plaintiffs**

6. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Fifty-Two through Fifty-Five of the Complaint.

**Defendant Licensed Healthcare Professionals**

7. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Fifty-Six through One Hundred Nine of the Complaint.

8. Defendants admit allegations contained in Paragraph One Hundred Ten of the Complaint.

9. Defendants deny allegations contained in Paragraphs One Hundred Eleven of the Complaint.

**Defendant PCs**

10. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs One Hundred Twelve through One Hundred Twenty Nine, One Hundred Thirty Two through One Hundred Forty One, One Hundred Forty Four through One Hundred Seventy One of the Complaint.

11. Defendants admit that Defendant BSZ Chiropractic, P.C. (heretoeafter “BSZ”) is a corporation duly organized under the laws of the State of New York. Defendants deny the remaining allegations contained in Paragraph One Hundred Thirty.

12. Defendants deny allegations contained in the Paragraphs One Hundred Thirty One and One Hundred Forty Three of the Complaint.

13. Defendants admit that Defendant Golden Hands Chiropractic, P.C. (heretoeafter “Golden”) is a corporation duly organized under the laws of the State of New York. Defendants deny the remaining allegations contained in Paragraph One Hundred Forty Two.

**ANSWERING ALLEGATIONS RELATED TO JURISDICTION AND VENUE**

14. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs One Hundred Seventy Two through One Hundred Seventy Four of the Complaint.

**ANSWERING ALLEGATIONS RELATED TO FACTUAL BACKGROUND**

15. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs One Hundred Seventy Five through One Hundred Seventy Six, One Hundred Eighty One, One Hundred Eighty Six of the Complaint.

16. Defendants deny allegations contained in Paragraphs One Hundred Seventy Seven through One Hundred Eighty, One Hundred Eighty Two through One Hundred Eighty Five, One Hundred Eighty Seven through One Hundred Ninety of the Complaint.

**ANSWERING ALLEGATIONS RELATED TO THE MECHANICS OF THE SCHEME  
TO DEFRAUD**

17. Defendants deny allegations contained in Paragraphs One Hundred Ninety One through One Hundred Ninety Five of the Complaint.

**ANSWERING ALLEGATIONS RELATED TO THE VsNCT TESTING SCHEME TO  
DEFRAUD**

**The Human Nervous System**

18. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs One Hundred Ninety Six through Two Hundred Eight of the Complaint.

19. Defendants deny allegations contained in Paragraphs One Hundred Nine of the Complaint.

**Diagnosing Nerve Abnormalities**

20. Defendants deny allegations contained in Paragraph Two Hundred Ten, Two Hundred Twenty-One through Two Hundred Twenty-Four of the Complaint.

21. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Eleven through Two Hundred Twenty of the Complaint.

**Background of the Medi-DX 7000 and Axon-II VsNCT Testing Devices**

22. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Twenty-Five through Two Hundred Thirty-One of the Complaint.

23. Defendants deny allegations contained in Paragraph Two Hundred Thirty-Two through Two Hundred Forty-Five of the Complaint.

**Fraudulent Billing using CPT Code 95904**

24. Defendants deny allegations contained in Paragraphs Two Hundred Forty-Six of the Complaint and rely on documents for its contents, if any.

25. Defendants deny allegations contained in Paragraphs Two Hundred Forty-Seven, Two Hundred Fifty-Seven and Two Hundred Fifty-Eight of the Complaint.

26. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Forty-Eight through Two Hundred Fifty Six of the Complaint.

**Unnecessary VsNCT Testing and Fraudulent Misrepresentations**

27. Defendants deny allegations contained in Paragraphs Two Hundred Fifty-Nine through Two Hundred Sixty-Nine of the Complaint.

**ANSWERING ALLEGATIONS RELATED TO THE DISCOVERY OF THE FRAUD**

28. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraph Two Hundred Seventy of the Complaint.

**ANSWERING ALLEGATIONS RELATED TO STATEMENT OF CLAIMS**

**Answering First Claim of Relief**

29. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Seventy-One through Two Hundred Eighty-Four of the Complaint.

**Answering Second Claim of Relief**

30. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Eighty-Five through Two Hundred Ninety-Seven of the Complaint.

**Answering Third Claim of Relief**

31. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Two Hundred Ninety-Eight through Three Hundred One of the Complaint.

**Answering Fourth Claim for Relief**

32. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Two through Three Hundred Fourteen of the Complaint.

**Answering Fifth Claim for Relief**

33. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Fifteen through Three Hundred Twenty-Seven of the Complaint.

**Answering Sixth Claim for Relief**

34. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Twenty-Eight through Three Hundred Thirty-One of the Complaint.

**Answering Seventh Claim for Relief**

35. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Thirty-Two through Three Hundred Forty-Four of the Complaint.

**Answering Eight Claim for Relief**

36. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Forty-Five through

Three Hundred Fifty-Seven of the Complaint.

**Answering Ninth Claim for Relief**

37. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Fifty-Eight through Three Hundred Sixty-One of the Complaint.

**Answering Tenth Claim for Relief**

38. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Sixty-Two through Three Hundred Seventy-Four of the Complaint.

**Answering Eleventh Claim for Relief**

39. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Seventy-Five through Three Hundred Eighty-Seven of the Complaint.

**Answering Twelfth Claim for Relief**

40. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Eighty-Eight through Three Hundred Ninety-One of the Complaint.

**Answering Thirteenth Claim for Relief**

41. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Three Hundred Ninety-Two through Four Hundred Four of the Complaint.

**Answering Fourteenth Claim for Relief**

42. Defendants deny having sufficient knowledge and information to form a belief as

to the truthfulness of the allegations contained in Paragraphs Four Hundred Five through Four Hundred Seventeen of the Complaint.

**Answering Fifteenth Claim for Relief**

43. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Eighteen through Four Hundred Twenty-One of the Complaint.

**Answering Sixteenth Claim for Relief**

44. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Twenty-Two through Four Hundred Thirty-Four of the Complaint.

**Answering Seventeenth Claim for Relief**

45. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Thirty-Five through Four Hundred Forty-Seven of the Complaint.

**Answering Eighteenth Claim for Relief**

46. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Forty-Eight through Four Hundred Fifty-One of the Complaint.

**Answering Nineteenth Claim for Relief**

47. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Fifty-Two through Four Hundred Sixty-Four of the Complaint.

**Answering Twentieth Claim for Relief**

48. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Sixty-Five through Four Hundred Seventy-Seven of the Complaint.

**Answering Twenty-First Claim for Relief**

49. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Seventy-Eight through Four Hundred Eighty-One of the Complaint.

**Answering Twenty-Second Claim for Relief**

50. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Eighty-Two through Four Hundred Ninety-Four of the Complaint.

**Answering Twenty-Third Claim for Relief**

51. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Four Hundred Ninety-Five through Five Hundred Seven of the Complaint.

**Answering Twenty-Fourth Claim for Relief**

52. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Eight through Five Hundred Eleven of the Complaint.

**Answering Twenty-Fifth Claim for Relief**

53. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Twelve through Five

Hundred Twenty-Four of the Complaint.

**Answering Twenty-Sixth Claim for Relief**

54. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Twenty-Five through Five Hundred Thirty-Seven of the Complaint.

**Answering Twenty-Seventh Claim for Relief**

55. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Thirty-Eight through Five Hundred Forty-One of the Complaint.

**Answering Twenty-Eighth Claim for Relief**

56. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Forty-Two through Five Hundred Fifty-Four of the Complaint.

**Answering Twenty-Ninth Claim for Relief**

57. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Fifty-Five through Five Hundred Sixty-Seven of the Complaint.

**Answering Thirtieth Claim for Relief**

58. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Sixty-Eight through Five Hundred Seventy-Two of the Complaint.

**Answering Thirty-Fist Claim for Relief**

59. Defendants deny having sufficient knowledge and information to form a belief as

to the truthfulness of the allegations contained in Paragraphs Five Hundred Seventy-Two through Five Hundred Eighty-Four of the Complaint.

**Answering Thirty-Second Claim for Relief**

60. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Eighty-Five through Five Hundred Ninety-Seven of the Complaint.

**Answering Thirty-Third Claim for Relief**

61. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Five Hundred Ninety-Eight through Six Hundred One of the Complaint.

**Answering Thirty-Fourth Claim for Relief**

62. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Two through Six Hundred Fourteen of the Complaint.

**Answering Thirty-Fifth Claim for Relief**

63. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Fifteen through Six Hundred Twenty-Seven of the Complaint.

**Answering Thirty-Sixth Claim for Relief**

64. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Twenty-Eight through Six Hundred Thirty-One of the Complaint.

**Answering Thirty-Seventh Claim for Relief**

65. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Thirty-Two through Six Hundred Forty-Four of the Complaint.

**Answering Thirty-Eighth Claim for Relief**

66. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Forty-Five through Six Hundred Fifty-Seven of the Complaint.

**Answering Thirty-Ninth Claim for Relief**

67. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Fifty-Eight through Six Hundred Sixty-One of the Complaint.

**Answering Fortieth Claim for Relief**

68. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Sixty-Two through Six Hundred Seventy-Four of the Complaint.

**Answering Forty-First Claim for Relief**

69. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Seventy-Five through Six Hundred Eighty-Seven of the Complaint.

**Answering Forty-Second Claim for Relief**

70. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Eighty-Eight through

Six Hundred Ninety-One of the Complaint.

**Answering Forty-Third Claim for Relief**

71. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Six Hundred Ninety-Two through Seven Hundred Four of the Complaint.

**Answering Forty-Fourth Claim for Relief**

72. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Five through Seven Hundred Seventeen of the Complaint.

**Answering Forty-Fifth Claim for Relief**

73. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Eighteen through Seven Hundred Twenty-One of the Complaint.

**Answering Forty-Sixth Claim for Relief**

74. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Twenty-Two through Seven Hundred Thirty-Four of the Complaint.

**Answering Forty-Seventh Claim for Relief**

75. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Thirty-Five through Seven Hundred Forty-Six of the Complaint.

**Answering Forty-Eighth Claim for Relief**

76. Defendants deny having sufficient knowledge and information to form a belief as

to the truthfulness of the allegations contained in Paragraphs Seven Hundred Forty-Seven through Seven Hundred Fifty of the Complaint.

**Answering Forty-Ninth Claim for Relief**

77. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Fifty-One through Seven Hundred Sixty-Three of the Complaint.

**Answering Fiftieth Claim for Relief**

78. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Sixty-Four through Seven Hundred Seventy-Six of the Complaint.

**Answering Fifty-First Claim for Relief**

79. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Seventy-Seven through Seven Hundred Eighty of the Complaint.

**Answering Fifty-Second Claim for Relief**

80. Defendant neither deny nor admit allegations contained in Paragraph Seven Hundred Eighty-One of the Complaint, as neither admission nor denial is required.

81. Defendants deny allegations contained in Paragraphs Seven Hundred Eighty-Two through Seven Hundred Eighty-Nine and Seven Hundred Ninety-One of the Complaint.

82. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Seven Hundred Ninety, Seven Hundred Ninety Two and Seven Hundred Ninety Three of the Complaint.

**Answering Fifty-Third Claim for Relief**

83. Defendants neither deny nor admit allegations contained in Paragraph Seven Hundred Ninety-Four of the Complaint, as neither denial nor admission is required.

84. Defendants deny allegations contained in Paragraphs Seven Hundred Ninety-Five through Eight Hundred Two and Eight Hundred Five of the Complaint.

85. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of allegations contained in Paragraphs Eight Hundred Three, Eight Hundred Four and Eight Hundred Six of the Complaint.

**Answering Fifty-Fourth Claim for Relief**

86. Defendants neither deny nor admit allegations contained in Paragraph Eight Hundred Seven of the Complaint, as neither denial nor admission is required.

87. Defendants deny allegations contained in Paragraphs Eight Hundred Eight of the Complaint.

88. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of allegations contained in Paragraphs Eight Hundred Nine and Eight Hundred Ten of the Complaint.

**Answering Fifty-Fifth Claim for Relief**

89. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Eleven through Eight Hundred Twenty-Three of the Complaint.

**Answering Fifty-Sixth Claim for Relief**

90. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Twenty-Four

through Eight Hundred Thirty-Six of the Complaint.

**Answering Fifty-Seventh Claim for Relief**

91. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Thirty-Seven through Eight Hundred Forty of the Complaint.

**Answering Fifty-Eighth Claim for Relief**

92. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Forty-One through Eight Hundred Fifty-Three of the Complaint.

**Answering Fifty-Ninth Claim for Relief**

93. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Fifty-Four through Eight Hundred Sixty-Six of the Complaint.

**Answering Sixtieth Claim for Relief**

94. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eight Hundred Sixty-Seven through Eight Hundred Seventy of the Complaint.

**Answering Sixty-First Claim for Relief**

95. Defendants neither deny nor admit allegations contained in Paragraph Eight Hundred Seventy-One of the Complaint, as neither denial nor admission is required.

96. Defendants deny allegations contained in Paragraphs Eight Hundred Seventy-Two through Eight Hundred Seventy-Nine of the Complaint.

97. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of allegations contained in Paragraphs Eight Hundred Eighty and Eight Hundred Eight Hundred Eighty-Three of the Complaint.

**Answering Sixty-Second Claim for Relief**

98. Defendants neither deny nor admit allegations contained in Paragraph Eight Hundred Eighty-Four of the Complaint, as neither denial nor admission is required.

99. Defendants deny allegations contained in Paragraphs Eight Hundred Eighty-Five through Eight Hundred Ninety-One and Eight Hundred Ninety-Five of the Complaint.

100. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of allegations contained in Paragraphs Eight Hundred Ninety-Two through Eight Hundred Ninety-Four and Eight Hundred Ninety-Six of the Complaint.

**Answering Sixty-Third Claim for Relief**

101. Defendants neither deny nor admit allegations contained in Paragraph Eight Hundred Ninety-Seven of the Complaint, as neither denial nor admission is required.

102. Defendants deny allegations contained in Paragraph Eight Hundred Ninety-Eight of the Complaint.

103. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of allegations contained in Paragraphs Eight Hundred Ninety-Nine and Nine Hundred of the Complaint.

**Answering Sixty-Fourth Claim for Relief**

104. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred One through Nine Hundred Thirteen of the Complaint.

**Answering Sixty-Fifth Claim for Relief**

105. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Fourteen through Nine Hundred Twenty-Six of the Complaint.

**Answering Sixty-Sixth Claim for Relief**

106. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Twenty-Seven through Nine Hundred Thirty of the Complaint.

**Answering Sixty-Seventh Claim for Relief**

107. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Thirty-One through Nine Hundred Forty-Three of the Complaint.

**Answering Sixty-Eighth Claim for Relief**

108. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Forty-Four through Nine Hundred Fifty-Six of the Complaint.

**Answering Sixty-Ninth Claim for Relief**

109. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Fifty-Seven through Nine Hundred Sixty of the Complaint.

**Answering Seventieth Claim for Relief**

110. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Sixty-One through

Nine Hundred Seventy-Three of the Complaint.

**Answering Seventy-First Claim for Relief**

111. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Seventy-Four through Nine Hundred Eighty-Six of the Complaint.

**Answering Seventy-Second Claim for Relief**

112. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Eighty-Seven through Nine Hundred Ninety of the Complaint.

**Answering Seventy-Third Claim for Relief**

113. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Nine Hundred Ninety-One through Ten Hundred Three of the Complaint.

**Answering Seventy-Fourth Claim for Relief**

114. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Four through Ten Hundred Sixteen of the Complaint.

**Answering Seventy-Fifth Claim for Relief**

115. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Seventeen through Ten Hundred Twenty of the Complaint.

**Answering Seventy-Sixth Claim for Relief**

116. Defendants deny having sufficient knowledge and information to form a belief as

to the truthfulness of the allegations contained in Paragraphs Ten Hundred Twenty-One through Ten Hundred Thirty-Four of the Complaint.

**Answering Seventy-Seventh Claim for Relief**

117. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Thirty-Four through Ten Hundred Forty-Six of the Complaint.

**Answering Seventy-Eighth Claim for Relief**

118. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Forty-Seven through Ten Hundred Fifty of the Complaint.

**Answering Seventy-Ninth Claim for Relief**

119. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Fifty-One through Ten Hundred Sixty-Three of the Complaint.

**Answering Eightieth Claim for Relief**

120. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Sixty-Four through Ten Hundred Seventy-Six of the Complaint.

**Answering Eighty-First Claim for Relief**

121. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Seventy-Seven through Ten Hundred Eighty of the Complaint.

**Answering Eighty-Second Claim for Relief**

122. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Eighty-One through Ten Hundred Ninety-Three of the Complaint.

**Answering Eighty-Third Claim for Relief**

123. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Ten Hundred Ninety-Four through Eleven Hundred Six of the Complaint.

**Answering Eighty-Fourth Claim for Relief**

124. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Seven through Eleven Hundred Ten of the Complaint.

**Answering Eighty-Fifth Claim for Relief**

125. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Eleven through Eleven Hundred Twenty-Three of the Complaint.

**Answering Eighty-Sixth Claim for Relief**

126. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Twenty-Four through Eleven Hundred Thirty-Six of the Complaint.

**Answering Eighty-Seventh Claim for Relief**

127. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Thirty-Seven

through Eleven Hundred Forty of the Complaint.

**Answering Eighty-Eighth Claim for Relief**

128. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Forty-One through Eleven Hundred Fifty-Three of the Complaint.

**Answering Eighty-Ninth Claim for Relief**

129. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Fifty-Four through Eleven Hundred Sixty-Six of the Complaint.

**Answering Ninetieth Claim for Relief**

130. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Sixty-Seven through Eleven Hundred Seventy-One of the Complaint.

**Answering Ninety-First Claim for Relief**

131. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Seventy-One through Eleven Hundred Eighty-Three of the Complaint.

**Answering Ninety-Second Claim for Relief**

132. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Eighty-Four through Eleven Hundred Eighty-Seven of the Complaint.

**Answering Ninety-Third Claim for Relief**

133. Defendants neither deny nor admit allegations contained in Paragraph Eleven Hundred Eighty-Eight, as neither denial nor admission is required.

134. Defendants deny allegations contained in Paragraphs Eleven Hundred Eighty-Nine through Eleven Hundred Ninety-One of the Complaint.

135. Defendants deny having sufficient knowledge and information to form a belief as to the truthfulness of the allegations contained in Paragraphs Eleven Hundred Ninety-Two and Eleven Hundred Ninety-Three of the Complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

136. Plaintiffs' complaint fails to state a claim with respect to answering Defendants, upon which relief can be granted.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

137. Plaintiffs' complaint fails to set forth allegations with particularity and specificity as requested by Rule 9(b) of the Federal Rules of Civil Procedure.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

138. Plaintiffs' claims are barred by Plaintiffs' unclean hands and/or fraudulent conduct.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

139. Plaintiffs' claims are barred by the Statute of Frauds.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE**

140. Plaintiffs' damages, if any, were caused by Plaintiffs' own actions and/or omissions.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE**

141. Plaintiffs have ratified the activities of answering Defendants.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE**

142. Plaintiffs' claims are barred by the doctrine of laches and delay.

**AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE**

143. Plaintiffs' claims are barred by impossibility and impracticability.

**AS AND FOR A NINTH AFFIRMATIVE DEFENSE**

144. Plaintiffs' claims are barred by estoppel and waiver.

**AS AND FOR A TENTH AFFIRMATIVE DEFENSE**

145. Plaintiffs have failed to mitigate its damages.

**AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE**

146. Plaintiffs' complaint is barred by the applicable Statute of Limitations.

**AS AND FOR A TWELFTH AFFIRMATIVE DEFENSE**

147. Plaintiffs are barred from recovery as they have failed to comply with the rules and regulations of the State of New York pertaining to no-fault insurance coverage.

**AS AND FOR A THIRTEENTH AFFIRMATIVE DEFENSE**

148. Plaintiffs are barred from recovery as any damages suffered have been recouped through subrogation.

**AS AND FOR A FOURTHEENTH AFFIRMATIVE DEFENSE**

149. Plaintiffs are barred from recovery as any damages suffered have been passed through to insureds through the adjustment of insurance rates as reported to the New York Insurance Department.

**AS AND FOR A FIFTEENTH AFFIRMATIVE DEFENSE**

150. Answering Defendants did not violate RICO or cause any alleged damages that would be recoverable under said act.

**AS AND FOR A SIXTEENTH AFFIRMATIVE DEFENSE**

151. The individually answering Defendant is not personally liable for the claims in Plaintiffs' Complaint under New York Law including without limitation, the Business Corporation Law.

**AS AND FOR A SEVENTEENTH AFFIRMATIVE DEFENSE**

152. Plaintiffs cannot maintain a cause of action for fraud or unjust enrichment derived from a claim for breach of contract.

**AS AND FOR AN EIGHTEENTH AFFIRMATIVE DEFENSE**

153. Answering Defendants hereby incorporate by reference all of these defenses asserted in the Answers of the other co-defendants in this case to the extent they are not inconsistent with their position herein.

WHEREFORE, Defendants BSZ Chiropractic, P.C., Golden Hands Chiropractic, P.C. and Yakov Zilberman, D.C. demand that the Complaint against them be dismissed in its entirety together with such other and different relief as this Court deems just and proper.

Dated: Brooklyn, New York  
December 29, 2014

/s/ Natalia Skvortsova  
Natalia Skvortsova, Esq.  
Law Firm of Natalia Skvortsova, PLLC  
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Brooklyn, NY 11223  
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**CERTIFICATE OF SERVICE**

I, Natalia Skvortsova, Esq. do hereby certify that a true and accurate copy of the foregoing Answer was served upon all counsel of record by ECF and US Mail 1<sup>st</sup> Class postage prepaid this 29<sup>th</sup> day of December, 2014.

/S/ Natalia Skvortsova  
Natalia Skvortsova, Esq.